

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

SEP 09 2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

IBRAHEEM AHMED AL BAYATI

Defendant

§
§
§
§
§
§

Criminal No.

4:20-CR-412

INDICTMENT

THE GRAND JURY CHARGES THAT:

Count One

Threat by Interstate Communication - 18 U.S.C. § 875(c)

On or about September 2, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the **Defendant**,

IBRAHEEM AHMED AL BAYATI,

did intentionally transmit in interstate commerce a threat to injure the person of another at the University of Houston in the coming days, knowing that the communication would be viewed as a threat, said threat being made during one of the university's online lectures.

In violation of Title 18, United States Code, Section 875(c).

Count Two

**Making Threats Or Conveying False Information To Destroy By Means of
Fire or Explosive - 18 U.S.C. § 844(e)**

On or about September 2, 2020, in the Southern District of Texas and
elsewhere within the jurisdiction of the Court, the **Defendant**,

IBRAHEEM AHMED AL BAYATI,

by means and use of an instrument of interstate commerce, namely, the internet,
willfully made a threat, and maliciously conveyed false information knowing the
same to be false, concerning an attempt being made, and to be made, to kill, injure
and intimidate individuals present in, attending, and working at the University of
Houston, and to damage and destroy real and personal property, to wit: the real and
personal property located at the University of Houston, by means of an explosive,
to wit: a bomb.

In violation of Title 18, United States Code, Section 844(e).

TRUE BILL: **Original Signature on File**



FOR PERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY
Southern District of Texas

Alamdar S. Hamdani

Alamdar S. Hamdani
Assistant United States Attorney